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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In re Applications of	)	MM Docket No. 99-153
	)	
READING BROADCASTING, INC.	)	File No. BRCT-940407KF
	)	
For Renewal of License of Station WTVE(TV), Channel 51, Reading, Pennsylvania	)	
	)	
and	)	
	)	
ADAMS COMMUNICATIONS CORPORATION	)	File No. BPCT-940630KG
	)	
For Construction Permit for a New Television Station On Channel 51, Reading, Pennsylvania	)	

TO: Administrative Law Judge Richard Sippel

CONSENT MOTION FOR SECOND EXTENSION OF TIME

Pursuant to Section 1.205 of the Commission's Rules, Reading Broadcasting, Inc. ("Reading"), by its attorneys, hereby requests a further one-week extension of time, to and including Friday, November 19, 1999, within which to submit its opposition to the Motion to Enlarge Issues (Unauthorized Transfer of Control and Misrepresentation/Lack of Candor) ("*Motion*") filed on October 20, 1999, by Adams Communications Corporation ("Adams").

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On October 25, 1999, Reading filed its initial *Consent Motion for Extension of Time* in which it requested an additional ten days to file its response. The Presiding Officer granted Reading's request in his *Order*, FCC 99M-69 (released October 28, 1999), *revised, Order*, 99M-72 (released November 3, 1999), and set November 12, 1999 as the due date for the responsive pleadings. This request is timely made because it is being filed before the time for performance and is not otherwise limited by statute. In support of its request, Reading sets forth the following:

In addition to its work on completing discovery on the comparative issues, Reading has been very busy in compiling and reviewing the relevant records for the time period addressed in Adams' *Motion*. However, because the relevant period relates back as far as ten years, Reading has experienced difficulty in promptly locating documents that must be reviewed and analyzed before counsel for Reading can prepare a thorough response. Even though Reading regards Adams' *Motion* as unsupported by either underlying facts or underlying case law, counsel for Reading needs to examine a variety of factual issues of varying complexity in forming its response. Reading wants to assure the Presiding Officer that counsel for Reading has been diligent and that the need for the additional, limited period of time within which to prepare its response arises from the nature of the case and the extent of the documents requiring review, not for lack of commitment.

Requiring the filing of Reading's opposition to Adams' *Motion* by November 12, 1999 will substantially prejudice Reading's rights and undermine the Presiding Officer's fair consideration of the facts, as it would unduly restrict counsel's ability to examine the relevant records, research the applicable law, and draft a well-reasoned brief.

An extension of one week will allow counsel for Reading to provide a careful, thorough and well-reasoned opposition to Adams' *Motion*. Without the benefit of Reading's well-reasoned opposition, the Presiding Officer will be unable to adequately review the merits of Adam's *Motion* and Reading's opposition thereto. Accordingly, grant of Reading's consent motion will assist the Presiding Officer in making an expeditious and legally correct decision which, in turn, serves the public interest.

Today, the undersigned contacted counsel for Adams, and James Shook, counsel for the Enforcement Bureau of the Mass Media Bureau seeking consent for the relief requested herein. Both parties have graciously consented to such further one week extension.

Therefore, for good cause shown, Reading respectfully requests that the date within which to file its opposition to Adams' *Motion* be extended to and include November 19, 1999.

Respectfully submitted,

READING BROADCASTING, INC.

By Thomas J. Hutton

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November 10, 1999

CERTIFICATE OF SERVICE

I, Ellen Wallace, a secretary in the law firm of Holland & Knight LLP do hereby certify that on November 10, 1999, a copy of the foregoing Consent Motion for Second Extension of Time was delivered by hand to the following:

The Honorable Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W., Room 1-C864
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(via hand delivery and fax (202) 418-0195)

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